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Attorneys for Plaintiff  
SPECIALTY LABORATORIES, INC.

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re  
TULARE LOCAL HEALTHCARE DISTRICT,  
dba TULARE REGIONAL MEDICAL CENTER,

Debtor.

SPECIALTY LABORATORIES, INC., a  
California corporation,  
Plaintiff,

v.

HCCA TULARE REGIONAL MEDICAL  
CENTER, an unknown business entity;  
HEALTHCARE CONGLOMERATE  
ASSOCIATES, LLC, a California Limited  
Liability Company;  
TULARE LOCAL HEALTH CARE DISTRICT, a  
California public entity;  
and Does 2 through 50, inclusive,

Defendants.

Case No. 17-13797  
Chapter 9  
Adv. No.: 18-01014

SPECIAL LABORATORIES, INC.'S  
INITIAL DISCLOSURES

Plaintiff Specialty Laboratories, Inc. ("Specialty Laboratories" or "Plaintiff") by and through its counsel, Chad M. Wilson, Esq., of Lanak & Hanna, P.C., hereby makes its Initial Disclosures pursuant to Fed. Bankr. P. 7026 and Fed. R. Civ. P.26(a)(1). These Initial Disclosures are made on information now reasonably available. Plaintiff has not yet fully completed its investigation of the case and therefore reserves the right to supplement these disclosures as its investigation continues.

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**A. NAMES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION  
(Fed. R. Civ. P.26(a)(1)(A)(1)).**

1. Specialty Laboratories, Inc. c/o Lanak & Hanna, P.C., 625 The City Drive South, Suite 190, Orange, CA 92868:

- a. PMK for Specialty Laboratories, Inc.
- b. Michael K. Bond, signatory to Laboratory Services Agreement
- c. Anna Tutunjian, Manager
- d. Susanna Sisilyan, Coordinator
- e. Hortensia Rivera, Client Revenue

2. Tulare Local Healthcare District c/o Walter Wilhelm Law Group, 205 E. River Park Circle, Suite 410, Fresno, California 93720:

- a. PMK for Tulare Local Healthcare District
- b. Ashley Sell, Accounts Payable
- c. Michael Jamaica, Secretary
- d. Sharon Fong, Lab Manager
- e. Delbert Bryant, Controller
- f. Sherrie Bell, Board Chairman/President
- g. Alan Germany, CFO/COO

3. HCCA c/o Klein, DeNatale, Goldner, Rosenlieb & Kimball, LLP, 5260 N. Palm Avenue, Suite 205, Fresno, California 93704:

- a. Yorai Benny Benzeevi, Chairman
- b. Evelyn Vallarta, Manager

4. Plaintiff reserves the right to supplement this disclosure as to individuals likely to have discoverable information that Plaintiff may use to support its claim.

**B. DOCUMENT DISCLOSURES (Fed.R. Civ.P. 26(a)(1)(A)(ii))**

1. Documents, electronically stored information and tangible things that Plaintiff may use to support its claim include:

- a. Laboratory Services Agreement dated February 27, 2007;

- b. Correspondence from Defendants requesting services from Plaintiff;
- c. Invoices for laboratory services including but not limited to the following:

Month	Invoice #
Dec-16	9168432316
Nov-16	9168115322
Oct-16	9167564360
Sep-16	9167090473
Aug-16	9166616616
Jul-16	9166106630
Jun-16	9165694070
May-16	9165233385

- d. Payments from Defendants for services provided by Plaintiff;
- e. Demand letters dated November 30, 2016, December 16, 2016, January 18, 2017, and March 2, 2017;
- f. Termination Letter dated January 5, 2017;
- g. Government Code Claim submitted June 28, 2017;
- h. Proof of Claim filed December 19, 2017;
- i. Answers of Defendants to First Amended Complaint; and
- j. Claims Register and List of Creditors.

- 2. The above described documents will be made available for inspection and copying pursuant a request made under Rule 34.
- 3. Plaintiff reserves the right to supplement this disclosure as to documents, electronically stored information and tangible things that Plaintiff may use to support its claim.

**C. COMPUTATION OF DAMAGES (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

Plaintiff's damages are based on the following unpaid invoices:

Month	Invoice #
Dec-16	9168432316

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Nov-16	9168115322
Oct-16	9167564360
Sep-16	9167090473
Aug-16	9166616616
Jul-16	9166106630
Jun-16	9165694070
May-16	9165233385

**D. INSURANCE AGREEMENT (Fed. R. Civ.P. 26(a)(1)(A)(iv)).**

Plaintiff is not aware of any insurance agreements that may provide coverage for its damages.

**E. EXPERT WITNESS (Fed.R. Civil.P.26(a)(2)(A)).**

Plaintiff reserves the right to supplement this disclosure as to expert witness identities and any written report generated on behalf of Plaintiff at such time the witnesses and/or materials become known to Plaintiff.

DATED: September 19, 2018

LANAK & HANNA, P.C.

By: s/ Chad M. Wilson

CHAD M. WILSON  
Attorneys for Plaintiff  
SPECIALTY LABORATORIES, INC.